

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Donald and Rebecca Sullivan
Debtor(s)**

**NO. 17-14019
Chapter 13**

MOTION TO BORROW

COME NOW THE Debtor(s) Donald and Rebecca Sullivan, and files this Motion To Borrow and for cause would show the following:

1. This case was filed on October 23, 2017.
2. The Debtors are having mechanical issues with their 2010 Dodge Caliber. They keep having to put in the shop for different issues and it is not getting repaired. It is having electrical problems as the windows will not work and the heat and air will not work.
3. The debtors would like to purchase a reliable vehicle.

WHEREFORE, PREMISES CONSIDERED, the Debtor is asking this Honorable Court to grant permission for the Debtors to purchase a vehicle of an amount no more than \$15,000.00, with the monthly payment not being more than \$400.00 per month, and the debtor paying the note outside of the Chapter 13 plan.

Respectfully submitted,

/s/ Heidi S. Milam
Heidi S. Milam, Bar No. 9813
Attorney for Debtor
P.O. Box 1169
Southaven, MS 38671
(662) 349-2322

CERTIFICATE OF SERVICE

I, Heidi S. Milam, certify that the above Motion was served to the following parties:

Locke D. Barkley
Chapter 13 Trustee
sbeasley@barkley13.com

U.S. Trustee
USTPRegion05.AB.ECF@usdoj.gov

This the 12th day of March, 2020.

/s/ Heidi S. Milam
Heidi S. Milam